



## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEFFREY D. ALBRIGHT, NORMAN T. FILED BOIRE, GARY M. DIETZ, WILLIAM H. HARRISBURG, PA ERDMAN, MICHAEL W. FRITZ, A. RONALD FROMBAUGH, RALPH A. JAN 1 7 2003 HARRIS, ALLEN W. LANDIS, LOWELL MCGUIRE, WALTER R. MINICH, MARY E. D'ANDREA, CLERK RAYMOND C. NEVINS, STANLEY L. NYE, Deputy Clerk VINCENT RAMIREZ, JR., KEITH E. SCRIGNOLI, RAY G. SNYDER, JR., and LAWRENCE D. WELKER, Case No. 1:CV-00-878 Plaintiffs Judge Sylvia H. Rambo DANIEL A. VIRTUE, Business Agent of the International Brotherhood of Teamsters; INTERNATIONAL BROTHERHOOD OF TEAMSTERS; LOCAL 776, INTERNATIONAL BROTHERHOOD OF TEAMSTERS; ABF FREIGHT SYSTEM, INCORPORATED, Defendants

## ERRATA SHEET FOR PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Please be advised that the following changes were not made to the *Plaintiffs' Brief in Opposition to Defendant's Motion for Summary Judgment* before being submitted to this Honorable Court. Please note the changes are as follows:

- 1. Page 8, Item #5, strike the word "clean" and replace it with the word "clear".
- 2. Page 9, Item #8, in the sentence, "...issued by Charles Shuggart in 1995..." strike the comma after "1995".
- 3. Page 9, Item #8, in the sentence, "...drivers ad hoc contacts..." please insert a comma after "contacts".
- 4. Page 13, Paragraph 2, in the sentence, "...Article 8 § 6(d)(1)." please insert a ")" after the period.

- 5. Page 14, Paragraph 1, in the sentence, "Because Defendants contend..." please strike the word "Because".
- 6. Page 16, Paragraph 2, in the sentence, "Again, this an issue raised..." please insert the phrase "discrimination issue is" after the word "this".
- 7. Page 16, Paragraph 2, in the sentence, "... Affidavits and documents." please strike the period after the word "documents" and insert the phrase ", along with the reasonableness issue."

By:

Robert S. Mirin, Esquire

ID# 25305

**AHMAD & MIRIN** 

2515 North Front Street Harrisburg, PA 17110

(717) 909-4343

## **CERTIFICATE OF SERVICE**

I, Sherry A. Clark, hereby certify that on this \_\_\_\_\_\_ day of January, 2003, a copy of Errata Sheet for Plaintiffs' Brief in Opposition to Defendant Motion for Summary Judgment was served via first-class mail, postage prepaid, on the following:

Joseph E. Santucci, Jr. Robyn Weiss MORGAN, LEWIS & BOCKIUS, L.L.P. 1111 Pennsylvania Avenue, N.W. Washington, DC 20004

Vincent Candiello MORGAN, LEWIS & BOCKIUS, L.L.P. One Commerce Square 417 Walnut Street Harrisburg, PA 17101

Ira Weinstock Jason Weinstock IRA WEINSTOCK, P.C. 800 N. 2<sup>nd</sup> Street Harrisburg, PA 17102

James A. McCall
Special Counsel
INTERNATIONAL BROTHERHOOD OF TEAMSTERS
25 Louisiana Avenue, N.W.
Washington, DC 20001

Sherry A. Clark, Paralegal